FILED May 02, 2023 Data Center Missouri Public Service Commission

Exhibit No. 171

Staff – Exhibit 171 Matthew R. Young Rebuttal Testimony File No. ER-2022-0337

Exhibit No.:Issue(s):Revenue RequirementWitness:Matthew R. YoungSponsoring Party:MoPSC StaffType of Exhibit:Rebuttal TestimonyCase No.:ER-2022-0337Date Testimony Prepared:February 15, 2023

MISSOURI PUBLIC SERVICE COMMISSION

FINANCIAL AND BUSINESS ANALYSIS DIVISION

AUDITING DEPARTMENT

REBUTTAL TESTIMONY

OF

MATTHEW R. YOUNG

UNION ELECTRIC COMPANY, d/b/a AMEREN MISSOURI

CASE NO. ER-2022-0337

Jefferson City, Missouri February 2023

1		REBUTTAL TESTIMONY OF
2		MATTHEW R. YOUNG
3 4		UNION ELECTRIC COMPANY, d/b/a AMEREN MISSOURI
5		CASE NO. ER-2022-0337
6	Q.	Please state your name and business address.
7	А.	My name is Matthew R. Young. My business address is 615 E. 13th Street,
8	Kansas City, Missouri, 64105.	
9	Q.	Are you the same Matthew R. Young that filed direct testimony on
10	January 10, 2023?	
11	А.	Yes I am.
12	Q.	What is the purpose of your rebuttal testimony?
13	А.	I will describe certain revisions to Staff's revenue requirement calculations.
14	These revisions were made subsequent to Staff's January 10, 2023 filing but were reflected in	
15	Staff's January 24, 2023 class cost of service filing.	
16	Q.	How do the revisions affect Staff's revenue requirement?
17	А.	The revisions affect Staff's annualized and normalized cost of fuel,
18	fuel additives, incentive compensation, and income tax expense.	
19	Q.	What caused Staff to revise its recommended amount for these costs?
20	А.	Subsequent to Staff's January 10, 2023 filing, Staff became aware of an error
21	in its fuel modeling inputs. The correction of the inputs changed the modeled output of each	
22	of Ameren Missouri's power plants. The change in output necessitated a revision to each of	
23	Staff's adjustments that were based on modeled production including fuel expense, fuel	
24	additives, and	income tax expense (due to changes in the depreciation add back/deduction).

Rebuttal Testimony of Matthew R. Young

Q.

The revision to incentive compensation was necessary to correct two errors in
Staff's workpaper. Staff's direct workpaper removed "below the line" costs twice and also
used an incorrect capitalization percentage to remove earnings-based costs from rate base.

Does this conclude your rebuttal testimony?

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A. Yes it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

)

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service

Case No. ER-2022-0337

AFFIDAVIT OF MATTHEW R. YOUNG

SS.

STATE OF MISSOURI) COUNTY OF JACKSON)

COMES NOW MATTHEW R. YOUNG and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing Rebuttal Testimony of Matthew R. Young; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

MATTHEW R. YOUNG

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for th the City of Jackson, State of Missouri, at my office in Kansas City, on this day of February 2023.

Notary Public



M. RIDENHOUR My Commission Expires July 22, 2023 Platte County Commission #19603483